

EXHIBIT C



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Re: United States v. Mehdi Nikparvar-Fard, et. al.

Criminal No. 18-101

Discovery Production Two – Audio and Video Recordings, DEA Paperwork, Search Warrants, Three Patient Files Discussed in Dr. Thomas’s Report, Proposed Schedule to Access and Review AUC Patient Files Not Discussed in Dr. Thomas’s Report, Millenium Laboratory Reports, Information about Confidential Sources (CS) and Undercover Officers (UC) named in DEA Paperwork, Statements made by Defendants, etc.

Dear Counsel:

I am enclosing the following discovery materials in the above-captioned case.

First, a hard copy of an 11-page Excel Spreadsheet that summarizes evidence recovered by the DEA in the investigation. We have prepared this spreadsheet to assist you in reviewing the evidence recovered by the DEA, which is voluminous. The spreadsheet begins at “Exhibit N-1” (page 1) and concludes at “Voicemail from Deb Cortez” (page 11). There is a description of each item of evidence, and a letter “P” (for Passed) or “A” (for Available) for each item of evidence.

Second, a total of nine (9) DVDs. The DVDs are numbered 1, 2, 3, etc. Please note that you will need to use the password [REDACTED] to open these discs.

We have also included a hard copy of a 24-page Excel Spreadsheet that summarizes the evidence found on the nine (9) DVDs. In particular, the 24-page spreadsheet details the Disc # and Bates # where items are located. You will see that Disc 1 begins at Bates # 067957, and that Disc 9 ends at Bates # 109387.

All of the items labelled “P” in the 11-page Excel Spreadsheet are contained on these DVDs. None of the items labelled “A” in the 11-page Excel Spreadsheet are contained on these

DVDs. If you wish to review any of these "A" materials, they are available to you. Please call me and we will make the necessary arrangements for you to review them.

Third, PDF copies of patient files for:

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-
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These three patient files were not included in the first discovery production, but were discussed in Dr. Stephen Thomas's report. You will find these three patient files on Disc 9. The other patient files discussed in Dr. Thomas's report were produced in the first discovery production.

Fourth, PDF copies of the various search warrants, applications for search warrants, affidavits, and court filings, that led to the recovery of evidence in this investigation. These materials are found on Disc 9.

Fifth, PDF copies of the DEA paperwork generated in this investigation. These materials are found on Disc 1. If the redactions to the DEA reports present any problems, please call me to discuss.

As you will see in reviewing the DEA paperwork, the investigation by federal law enforcement utilized confidential sources ("CS") and undercover officers ("UC"). The DEA paperwork identifies the following five confidential sources by number:

- CS-14-148124
- CS-15-150171
- CS-15-150355
- CS-17-154751
- CS-17-156359

I will write separately to disclose what, if any, payments/benefits were provided to each CS used in the investigation.

The DEA paperwork explains that undercover officers were used in the investigation. The undercover officers are:

- DEA Agent
- DEA Agent



- DEA TFO [REDACTED] (aka [REDACTED], chart reviewed by Dr. Stephen Thomas and made part of his report)
- Pennsylvania State Police Trooper [REDACTED]

Sixth, a PDF copy of the Millenium Laboratory Reports generated for the patients detailed in Dr. Stephen Thomas's report. You will also find correspondence between Advanced Urgent Care ("AUC") and Millenium Laboratories in these materials. These materials are found on Discs 7, 8, and 9.

Seventh, I recognize there may be AUC patient files that your clients want to use as part of their defense in this case. Along those lines, on Disc 9, there is a list of patient names and DOBs (in an Excel Spreadsheet) the reflects the patient files seized pursuant to federal search warrants on July 9, 2015. These patient files are available for your review. Please note the names listed in the spreadsheet reflect urgent care, suboxone, and pain management patients.

If you wish to review AUC patient files (not named in Dr. Stephen Thomas's report), I am asking that you notify me in writing of the names and dates of birth for those patients. The AUC patient files will then be made available for your review at the U.S. Attorney's Office on the following dates:

- Monday, June 10, 2019 from 10 a.m. to 4:00 p.m.
- Monday, June 24, 2019 from 10 a.m. to 4:00 p.m.
- Monday, July 8, 2019 from 10 a.m. to 4:00 p.m.

We will need the patient names and dates of birth at least one week before the above-referenced dates. In other words, if you want to review files on June 10th, we need the patient names by June 3rd or earlier.

Special Agent Syreeta Scott will be present at the U.S. Attorney's Office on all three dates to assist, if necessary, with any questions you may have. The DEA will have a form for you to complete to acknowledge that you have not removed or re-organized any paper(s) in the patient files. I understand this form may seem unnecessary; that said, because the patient files are the original evidence, we need to make sure they are kept in the condition they were found in.

If you find AUC patient files that you want to use as part of your client's defense, you can copy those materials at the U.S. Attorney's Office.

Eighth, various defendants have made statements to federal law enforcement that are relevant to the charges in the superseding indictment. PDF copies of the transcribed statements

and/or PDF summaries of the statements are included as part of this discovery production. These materials are found on Disc 1. The defendants are:

- Mehdi Nikparvar-Fard, to United States Marshals, audio recorded by U.S. Marshal Johannes Jarkowsky, on August 29, 2017. On page five of a PDF copy of the transcribed statement, Nikparvar-Fard discusses how his patients (whom he refers to with a racial epithet) will not leave him as they “need me because I give them oxycodone, they need me.”
- Vincent Thompson, to FBI Agent John Dolan, on January 16, 2019. PDF summary of statement.
- Avrom Brown, to DEA Agent Daniel Soeffing, via phone calls on August 4, 2017, and August 7, 2017. PDF summary of statements.
- Frederick Reichle, to FBI Agent Scott Freidenreich, on October 23, 2017. PDF summary of statement.
- Frederick Reichle, to FBI Agent John Dolan via phone call, on March 20, 2015. PDF summary of statement.
- Debra Cortez, to DEA Task Force Officer James Seshier, on January 16, 2019. PDF summary of statement.
- William Demedio, to HHS Agent Jonathan Bork, on January 16, 2019. PDF summary of statement.
- Marcus Rey Williams, to DEA Investigator Steven Porcelli, on September 5, 2013. PDF summary of statement.
- Joanne Rivera, to DEA Task Force Officer Joseph Slobodrian, audio recorded on July 9, 2015. PDF copy of transcribed statement and audio recording.

Prior to the superseding indictment, some charged defendants met with the government and provided statements pursuant to our standard proffer letter. Those summaries will be provided at a later date.

Ninth, a PDF copy of an interim report of Dr. Stephen Thomas (dated March 6, 2018). This was requested by Hope Lefeber, Esq., in an e-mail sent on April 2, 2019. You will find this report on Disc 9.

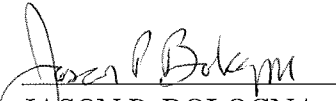
Tenth, please note that all of the computer evidence seized as part of this investigation will be provided via a hard drive. Simply put, you are getting everything. Please note that you will need to provide the government with a four (4) Terabyte hard drive. Upon receiving that hard drive, the U.S. Attorney’s Office will scan the computer evidence onto it. Based on my conversations with the Litigation Support Unit, this process will take approximately five days from receipt of the hard drive.

If any of the materials I have described are missing from the production, or if you cannot find them, please notify me immediately.

Thank you for your time and attention in this matter.

Sincerely yours,

WILLIAM M. MCSWAIN
United States Attorney



JASON P. BOLOGNA
SETH SCHLESSINGER
Assistant United States Attorneys

Exhibit Provided to Court Under Seal